UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN

STEPHEN E. ARTHUR,

CASE NO.

Plaintiff,

Judge

VS.

Magistrate Judge

EXPERIAN INFORMATION SOLUTIONS, INC., an Ohio corporation; EQUIFAX INFORMATION SERVICES, LLC, a Georgia company; TRANS UNION, LLC, a Delaware limited liability company; FIRST PREMIER BANK, a foreign corporation; and BANK OF AMERICA, N.A., a national banking association;

Defendants.

TRANS UNION, LLC'S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC ("Trans Union") hereby removes the subject action from the 32A District Court, Wayne County, Michigan, to the United States District Court for the Eastern District of Michigan, on the following grounds:

1. Plaintiff Stephen E. Arthur ("Plaintiff") served Trans Union on or about November 2, 2016, with a Summons and Complaint filed in the 32A District Court, Wayne County, Michigan. Copies of the Summons and Complaint, as

received, are attached hereto, redacted pursuant to Federal Rule of Civil Procedure 5.2, as **Exhibit A** and **Exhibit B**. No other process, pleadings or orders have been served on Trans Union.

- 2. Plaintiff makes claims under, alleges that Trans Union violated and alleges that Trans Union is liable under the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the "FCRA"). See Complaint ¶ 73-86.
- 3. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.
- 4. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the 32A District Court, Wayne County, Michigan, to the United States District Court for the Eastern District of Michigan.
- 5. Counsel for Trans Union has confirmed with the 32A District Court, Wayne County, Michigan, by telephone, that they have no document or file suggesting any other Defendant has been served. To the best of Trans Union's knowledge, no other named Defendant in this matter has been served as of the date and time of this Notice Of Removal.
- 6. Notice of this removal will promptly be filed with 32A District Court, Wayne County, Michigan and served upon all adverse parties.

WHEREFORE, Defendant Trans Union, LLC, by counsel, removes the subject action from the 32A District Court, Wayne County, Michigan to the United States District Court, Eastern District of Michigan.

Respectfully submitted,

s/ Laura K. Rang

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Lead Counsel for Defendant, Trans Union, LLC

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Local Counsel for Defendant, Trans Union, LLC

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN

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EXPERIAN INFORMATION
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CERTIFICATE OF SERVICE

I, Laura K. Rang, hereby certify that on the 3rd day of November, 2016, I electronically filed the foregoing with the Clerk of the Court using the ECF systems which will automatically send notification of such filing to the following counsel of record:

None	
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I further certify that on the **3rd day of November, 2016**, a copy of the foregoing was sent via U.S., First Class Mail, postage prepaid to the following non-ECF participants:

for Plaintiff Stephen E. Arthur
Gary D. Nitzkin, Esq.
Travis Shackelford, Esq.
Michigan Consumer Credit Lawyers

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s/ Laura K. Rang

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